

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-jfj
)	
1) CASTLE HILL STUDIOS LLC)	REDACTED
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**DECLARATION OF PETER SWANSON IN SUPPORT OF PLAINTIFF
VIDEO GAMING TECHNOLOGIES INC.’S MOTION TO EXCLUDE
THE TESTIMONY OF ROBERT ZEIDMAN IN PART**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. (“VGT”). I was admitted *pro hac vice* in this matter on August 8, 2017.

2. Attached as **Exhibit A** is a true and correct copy of excerpts from *The Software IP Detective’s Handbook*, written by Robert Zeidman and published in 2011.

3. Attached as **Exhibit B** is a true and correct copy of a document produced as CHG0015304–CHG0015331.

4. Attached as **Exhibit C** is a true and correct copy of an excerpt from the Deposition of Robert Zeidman, dated September 28, 2018.

5. Attached as **Exhibit D** is a true and correct copy of the Opening Expert Report of Stacy Friedman, dated August 10, 2018.

6. Attached as **Exhibit E** is a true and correct copy of the Rebuttal Expert Report of Robert Zeidman, dated August 31, 2018.

7. Attached as **Exhibit F** is a true and correct copy of an excerpt from the Deposition of Alan Roireau, dated August 1, 2018.

8. Attached as **Exhibit G** is a true and correct copy of an excerpt from the Deposition of Alan Roireau, dated May 15, 2018.

9. Attached as **Exhibit H** is a true and correct copy of an excerpt from the Deposition of Paul Suggs, dated June 8, 2018.

10. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 12, 2018 in Washington, District of Columbia.

/s/ Peter Swanson
Peter Swanson

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2018, I caused the foregoing Declaration of Peter Swanson to be filed via ECF, which caused the foregoing to be served on the following counsel for Defendants:

Robert C. Gill
Thomas S. Schaufelberger
Matthew J. Antonelli
Henry A. Platt
SAUL EWING ARNSTEIN & LEHR, LLP
1919 Pennsylvania Avenue, NW, Suite 550
Washington, D.C. 20006
(202) 295-6605
(202) 295-6705 (facsimile)
robert.gill@saul.com
tschauf@saul.com
matt.antonelli@saul.com
henry.platt@saul.com

Sherry H. Flax
SAUL EWING ARNSTEIN & LEHR, LLP
500 E. Pratt Street, Suite 900
Baltimore, Maryland 21202
(410) 332-8764
(410) 332-8785 (facsimile)
sherry.flax@saul.com

James C. Hodges, OBA 4254
JAMES C. HODGES, PC
2622 East 21st Street, Suite 4
Tulsa, OK 74114
Telephone: (918) 779-7078
JHodges@HodgesLC.Com

Duane H. Zobrist
Jonathan S. Jacobs
ZOBRIST LAW GROUP PLLC
1900 Arlington Blvd. Suite B
Charlottesville, VA 22903
Telephone: (434) 658-6400
dzobrist@zoblaw.com
jjacobs@zoblaw.com

Attorneys for Defendants

/s/ Gary M. Rubman